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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA, OAKLAND DIVISION**

ESTATE OF RAFAEL RAMIREZ LARA, deceased,
by and through PATRICIA RAMIREZ; PATRICIA
RAMIREZ; RAFAEL RAMIREZ; and JENNIFER
RAMIREZ,

Plaintiffs,

V.

COUNTY OF MONTEREY; SHERIFF STEVE BERNAL, in his individual and official capacity; JAMES BASS, in his individual and official capacity; JOHNATHAN THORNBURG, in his individual and official capacity; RAY TONGOL, in his individual and official capacity; J. TEJEDA; WELLPATH; KIP HALLMAN; JORGE DOMINICIS; THOMAS PANGBURN; PAUL FRANCISCO; RAYMOND HERR and CHRISTINA KAUPP,

Defendants.

Case No.: 4:21-cv-02409-PJH

**JOINT STIPULATION FOR DISMISSAL
OF ENTIRE CASE WITH PREJUDICE;
ORDER**

Pursuant to Federal Rule of Civil Procedure 41(a)(1)(A)(ii), Plaintiffs ESTATE OF RAFAEL RAMIREZ LARA, deceased, by and through PATRICIA RAMIREZ; PATRICIA RAMIREZ; RAFAEL RAMIREZ; and JENNIFER RAMIREZ, and Defendant WELLPATH, hereby stipulate to the voluntary dismissal of Plaintiffs' claims against Defendant Wellpath with prejudice. This dismissal resolves the entire action. Except as provided in the settlement agreements executed between Plaintiffs and Defendants, each Party is to bear its own costs, attorney's fees, and expenses and waives any claim for such costs, fees, and expenses. The Parties further recognize that, pursuant to the Court's October 5, 2022 Order, ECF 101, the Court retains jurisdiction to enforce the settlement agreements reached in this matter.

Respectfully Submitted,

Dated: January 19, 2023

RIFKIN LAW OFFICE

By: /s/ Lori Rifkin

Lori Rifkin
Attorney for Plaintiffs

Dated: January 19, 2023

BERTLING LAW GROUP

By: /s/ Jemma Parker Saunders

Peter G. Bertling
Jemma Parker Saunders
Attorneys for WELLPATH Defendants

ORDER

The Court, having considered the Parties' above joint notice and good cause appearing,
ORDERS as follows:

Plaintiffs' claims against Defendant Wellpath are dismissed with prejudice. This resolves the entire action. Pursuant to the Court's October 5, 2022 Order, ECF 101, the Court retains jurisdiction to enforce the settlement agreements reached in this matter.

IT IS SO ORDERED.

Dated: 1/20/2023


PHYLLIS J. HAMILTON
United States District Judge